

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

US EPA RECORDS CENTER REGION 5



1009067

Facility: RMI Company, Sodium Plant
Address P.O. Box 550
Ashtabula, OH 44044

Ohio Permit: 02-04-0584
USEPA ID: OHD000810242

County: Astabula

Facility Phone: 216-997-5141

Inspection Date: 8/17-18/92

Time: 10:00 5:30
9:00 - 2:30

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>Adrienne LaFavre</u>	<u>OEPA-Env. Spec II</u>	<u>216-963-1250</u>
	<u>Mark Bergman</u>	<u>OEPA-Env. Spec II</u>	<u>216-963-1215</u>
Facility Representatives:	<u>Dave Micsky</u>	<u>Env. Eng.</u>	<u>216-544-7802</u>
	<u>Douglas Korb</u>	<u>Plant Manager</u>	<u>216-997-5141</u>
	<u>Rick Mason</u>	<u>Dir. Env. Affairs</u>	<u>216-544-7688</u>

Land Disposal Restricted wastes managed? (yes) ☒ (no) ☐
If so, completed LDR checklist.

Is the facility operating as a generator? (yes) ☐ (no) ☒ (Plant in closure
all wastes now part of
closure activity)
If so, complete the applicable sections of the Generator Requirements checklist for
wastes being managed under generator status.

PERMIT STATUS

Permit Issued: June 9, 1988
Permit Effective Date: July 21, 1988 (Date of Journalization)
Permit Expiration Date: July 21, 1993 (Five years after date of Journalization)

AUTHORIZED ACTIVITIES

STORAGE

☒ Container
☐ Tank
☒ Waste Pile
☐ Surface Impoundment

TREATMENT

☐ Tank
☐ Surface Impoundment
☐ Incinerator
☒ Thermal Treatment
(Renewal)

DISPOSAL

☐ Injection Well
☐ Landfill
☐ Land Application
☐ Surface
Impoundment

Revised 10/25/91
(FINAL)

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FINAL STATE PART B INSPECTION CHECKLIST

RMI COMPANY, SODIUM PLANT

(OHD 000810242, 02-04-0584)

OCTOBER 25, 1991

RECEIVED
AUG 13 1992
OHIO EPA-N.E.D.O.

REMARKS - GENERAL INFORMATION

Include a list of the wastes being generated/managed at the site and a brief description of site activity and waste handling procedures:

The RMI Sodium Plant is no longer operational. The Facility is going through closure. There are/were three types of hazardous waste managed at the site.

- 1) Barium contaminated salt (from molten salt baths) - The last shipment of this waste type will leave the Facility in the next two weeks
- 2) Sodium - Sodium waste from closure activity of both RMI Sodium and RMI Metals is burned at RMI Sodium Plant. The annual burning limit has been reached (except for about 1000 pounds, for emergency). Sodium waste is not being collected for burning at this time in either plant.
- 3) Unidentified drums

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

	Y/N	N/A	RMK#
1. Has the expiration date of the permit passed? If so,	<u>N</u>	—	—
(a) Is the Permittee continuing any activity regulated by the permit after the expiration date of the permit?	<u>NA</u>	—	—
(b) Has the facility submitted an application for a permit renewal to the Director no later than (180) days prior to the expiration date of the permit (or upon a later date if the Permittee can demonstrate good cause for late submittal) [Condition A.6. (a)]?	<u>NA</u>	—	—
2. Has the Permittee submitted the annual permit fee, payable to Treasurer of the State, to the Ohio EPA on or before the anniversary of the date of issuance during the term of the permit [Condition A.25.]?	<u>Y</u>	—	—
3. Is the Permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit [Condition A.1. (b) and A.5]?	<u>Y</u>	—	>90 day drum storage
4. Have any provisions of the permit been identified as invalid? [Condition A.4]	<u>N</u>	—	—
5. Has the facility identified any instances of noncompliance with the permit, R.C. Chapter 3734 or the rules adopted thereunder, which may endanger human health or the environment? If so,	<u>N</u>	—	—
(a) Did the facility immediately report the following to Ohio EPA Emergency Response Section: [Condition A.19]			
i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and	<u>NA</u>	—	—
ii. Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health and the environment, including a description of:			
a. Name, address and telephone number of the owner or operator?	<u>NA</u>	—	—
b. Name, address and telephone number of the facility?	<u>NA</u>	—	—
c. Date, time, type and source of release?	<u>NA</u>	—	—

	Y/N	N/A	RMK#
d. Local weather conditions?	<u>NA</u>	_____	_____
e. Name and quantity of material(s) involved?	<u>NA</u>	_____	_____
f. The extent of injuries, if any?	<u>NA</u>	_____	_____
g. An assessment of the actual or potential hazard to the environment and human health, inside and outside the facility, where applicable?	<u>NA</u>	_____	_____
h. The response the facility took to contain and monitor the release?	<u>NA</u>	_____	_____
i. Who was notified?	<u>NA</u>	_____	_____
j. Any monitoring results?	<u>NA</u>	_____	_____
k. Estimated quantity and disposition of recovered material that resulted from the incident?	<u>NA</u>	_____	_____
6. Did the Permittee provide a written report to the Ohio EPA Emergency Response Section within (5) days of the time the Permittee became aware of the circumstances reported in Question 5? [Condition A.20] If so, did the report contain:	<u>NA</u>	_____	_____
(a) A description of the noncompliance (including exact dates and times)?	<u>NA</u>	_____	_____
(b) Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? and;	<u>NA</u>	_____	_____
(c) Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance?	<u>NA</u>	_____	_____
7. Has the Permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8.]	<u>NA</u>	_____	_____

- | | | Y/N | N/A | RMK# |
|-----|--|-----------|-----|------|
| 8. | Has the Permittee identified any other instances of noncompliance not provided for in Question #5? | <u>NA</u> | — | — |
| (a) | If so, did the Permittee report these instances to the Ohio EPA, DHWM within (15) days of becoming aware the noncompliance? [Condition A.21.] | <u>NA</u> | — | — |
| (b) | Do the reports provided contain the information set forth in Condition A.19? [Condition A.21.] | <u>NA</u> | — | — |
| (c) | Has the Permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8.] | <u>NA</u> | — | — |
| 9. | Has the Permittee planned any changes in the permitted facility or activity which may result in noncompliance with the conditions of the permit? | <u>NA</u> | — | — |
| (a) | If so, has the facility provided Ohio EPA with advance notice of such changes? [Condition A.16.] | <u>NA</u> | — | — |

NOTE: Such notification does not waive the Permittee's duty to comply with the permit pursuant to Condition A.5.

REMARKS

PERMIT MODIFICATION, REVISION, REVOCATION

	Y/N	N/A	RMK#
1. Has the Permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.]	<u>Y</u>		
2. Has the permit been transferred to a new owner or operator? [Condition A.17.]	<u>N</u>		
(a) If so, has the transfer been conducted in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.17.(a)] and;	<u>NA</u>		
(b) Before transferring ownership did the Permittee notify the new owner in writing of the requirements of R.C. Chapter 3734 and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.17.(a) B.2.(a)]	<u>NA</u>		
3. Has the Permittee submitted reports of compliance or non-compliance with, or any progress reports on the requirements contained in any compliance schedule of the permit to the Ohio EPA no later than (14) days following each scheduled date, unless otherwise specified? [Condition A.18.]	<u>Y</u>		<i>Inspection correspondence</i>
4. Has the Permittee furnished relevant information which the Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10.]	<u>Y</u>		
5. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10]	<u>Y</u>		
6. Has the Permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings or that it submitted incorrect or incomplete information in permit issuance proceedings or other submissions to Ohio EPA or Ohio HWFB? If so,	<u>N</u>		
(a) Has the Permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.22.]	<u>NA</u>		
7. Is the Permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications of the application? [Condition A.13.(c)]	<u>Y</u>		

- | | | Y/N | N/A | RMK# |
|-----|---|-----------|-------|-------|
| 8. | Is the Permittee retaining a complete copy of the approved application on-site? [Condition A.13.(c)] | <u>Y</u> | _____ | _____ |
| 9. | Is the Permittee planning any physical alterations or additions to the permitted facility? | <u>N</u> | _____ | _____ |
| (a) | If so, has the Permittee given notice to the Director of such alterations/additions? [Condition A.14] | <u>NA</u> | _____ | _____ |
| (b) | Have such changes been made in accordance with O.A.C. Rule 3745-50-51? [Condition A.14.] | <u>NA</u> | _____ | _____ |

REMARKS

SITE ENTRY - AVAILABILITY OF RECORDS

Y/N N/A RMK#

1. As specified in Condition A.11, has the Permittee allowed the Director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, to:

(a) Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit?

Y _____

(b) Have access to and copy any records required to be kept under the conditions of the permit?

Y _____

(c) Inspect facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit?

Y _____

(d) Sample or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734 and the rules adopted thereunder?

NA _____

REMARKS

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

Y/N N/A RMK#

1. Has the Permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.24.]

N

OPERATING RECORD

2. Is the Permittee maintaining a written operating record at the facility as set forth in O.A.C. Rules 3745-54-73 and 3745-54-74? [Condition B.18]
3. Is the Permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents: [Condition A.27.(a)]
 - (a) Waste analysis plan in accordance with O.A.C. Rule 3745-54-13 and the conditions of the permit?
 - (b) Contingency plan in accordance with O.A.C. Rule 3745-54-53 and the conditions of the permit?
 - (c) Closure plan in accordance with O.A.C. Rule 3745-55-12 and the conditions of the permit?
 - (d) Cost estimate for facility closure in accordance with O.A.C. Rule 3745-55-42 and the conditions of the permit? (estimate only - adequacy of estimate will be evaluated by C.O. financial assurance personnel)
 - (e) Personnel Training plan and records required by O.A.C. Rule 3745-54-16 and the conditions of the permit?
 - (f) Operating record required by O.A.C. Rule 3745-54-73 and the conditions of the permit?
 - (g) Inspection schedules developed in accordance with O.A.C. Rules 3745-54-15 and O.A.C. Rule 3745-55-74 and the conditions of the permit?
4. Have any of the documents identified in Question #3 been revised as required by the permit? If so,
 - (a) Has the Permittee submitted to the Ohio EPA? [Condition A.27.(b)]

Y

Y

Y

Y

Y

Y

Y

Y

N

NA

*Contingency Plan
needs update*

5. Is the Permittee maintaining copies of all inspection logs at the facility for a period of at least three years from date of inspection? [Condition A.27.(c)]

Y

ANNUAL REPORT REQUIREMENT

6. Is the Permittee complying with annual report requirements set forth in O.A.C. Rule 3745-54-75 and the additional report requirements set forth in O.A.C. Rule 3745-54-77 and the conditions of the permit? [Condition B.18(a)]

Y

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7. In compliance with Condition A.12.(b) of the permit, do the Permittee's records of monitoring information specify the:

*Information kept
at files, information
will be sent*

(a) Date(s), exact place(s), time(s) and method(s) of sampling or measurement?

(b) Individual(s) who performed the sampling or measurement?

(c) Date(s) analyses were performed?

(d) Individual(s) who performed the analyses?

(e) Analytical technique(s) or method(s) used?

(f) Results of such analyses?

8. Have the methods used to obtain a representative sample of the wastes to be analyzed included the appropriate SW-846 method or an equivalent method specified in the approved waste analysis plan? [Condition A.12(a)]

Y

9. Is the Permittee retaining records of monitoring information as required by the permit for at least (3) years from the date of sampling, including:

(a) All calibration and maintenance records?

NA

(b) All original strip chart recordings for continuous monitoring instrumentation? [Condition A.13.(a)]

NA

10. Has Ohio EPA requested submittal of any reports of other information required by the conditions of the permit from the Permittee? If so,

N

(a) Have the submittals been signed and certified according to O.A.C. Rule 3745-50-42? [Condition A.23]

NA

WASTE MINIMIZATION REQUIREMENTS

11. Does the Permittee certify, at least once every year, that the facility has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree determined by the Permittee to be economically feasible and that the current method of treatment, storage and disposal minimizes the threat to human health and the environment? [Condition F.1.]

Y

see below

REMARKS

Facility was active in waste minimization - had identified and changed several operational practices leading to reduced waste generation (less spillage around tanks, returning salt to cell). Waste minimization no longer possible since plant is in closure.

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

- | | Y/N | N/A | RMK# |
|--|----------|-----|------|
| 1. Is all hazardous waste transported to and from the facility by a properly registered transporter of hazardous waste in accordance with all applicable laws, rules and standards?
[Condition A.15. (b)] | <u>Y</u> | | — |
| 2. Is the Permittee complying with the following manifest requirements set forth in O.A.C. Chapter 3745-52 and O.A.C. Rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76:
[Condition B.17.] | | | |
| (a) All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 and, if necessary, USEPA form 8700-22A in compliance with O.A.C. Rule 3745-52-20 (A)? | <u>Y</u> | | — |
| (b) The manifest form used contains all information required by O.A.C. Rule 3745-52-20 and the minimum number of copies required by O.A.C. Rule 3745-52-22? | <u>Y</u> | | — |
| (c) The facility has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with O.A.C. Rule 3745-52-20 (C) (D) (E)? | <u>Y</u> | | — |
| (d) Prepared manifests have been signed by the facility and initial transporter in compliance with O.A.C. Rule 3745-52-23? | <u>Y</u> | | — |
| 3. Does the Permittee prohibit the receipt of hazardous waste from off-site? [Condition B.2. (a)] | <u>N</u> | | — |

Facility permitted
to receive waste
from RMI Metals

REMARKS

WASTE ANALYSIS/WASTE ANALYSIS PLAN

	Y/N	N/A	RMK#
1. Does the Permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with O.A.C. Chapters 3745-54 to 3745-57 and the terms and conditions of the permit? [O.A.C. Rule 3745-54-13 (A) (1)]	<u>Y</u>		
2. Is the Permittee following the procedures described in the approved waste analysis plan and the requirements of O.A.C. Rule 3745-54-13? [Condition B.3.]	<u>Y</u>		
3. Has the facility undergone a change in a process or operation generating hazardous waste which would require a repeat of the waste analysis? If so,	<u>N</u>		
(a) Did the facility conduct a repeat waste analysis in accordance with O.A.C. Rule 3745-54-13 (A) (3) (a)?	<u>NA</u>		
4. Does the Permittee sample and analyze for pH when conducting sampling for EP toxic metals (arsenic, barium, cadmium, lead, chromium, mercury, selenium and silver)? [Condition B.3. (b)]	<u>Y</u>		
5. Does the Permittee, throughout normal operation, conduct sufficient waste analysis to verify that the waste feed to the thermal treatment unit is within the physical and chemical composition specified in the permit and approved waste analysis plan? [Condition D.2.]	<u>Y</u>		
6. Is the facility permitted to receive waste from off-site? If so,	<u>Y</u>		
(a) Does the Permittee inspect hazardous wastes received to determine if the waste matches the identification of the waste on the accompanying manifest? [3745-54-13 (A) (4)]	<u>Y</u>		
(b) If the results of the inspection identified in 4 (a) reveal that the waste received does not match the waste designated on the manifest, has the facility repeated the waste analysis as required by O.A.C. Rule 3745-54-13 (A) (3) (b)?	<u>NA</u>		<u>Sodium received is Sodium they modured</u>
7. Is the Permittee sampling and analyzing off-site shipments of waste sodium for the same parameters as sodium waste generated on-site (prior to thermal treatment) [Condition B.3. (c)]?	<u>Y</u>		

GENERAL INSPECTION REQUIREMENTS

Y/N N/A RMK#

1. Is the Permittee following the procedures and schedules described Section F of the approved permit application and the following requirements of O.A.C. Rule 3745-54-15: [Condition B.5]
- Y —
- (a) Does the Permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [O.A.C. Rule 3745-54-15(A) (1) (2)]
- Y —
- (b) Has the Permittee developed and followed a written inspection schedule for inspecting; monitoring equipment safety equipment, emergency equipment, security devices and operating and structural equipment? [O.A.C. Rule 3745-54-15(1)]
- Y —
- i. Is the schedule kept at the facility? [O.A.C. Rule 3745-54-15(B) (2)]
- Y —
- ii. Does the schedule identify the types of problems which are to be looked for during the inspection? [O.A.C. Rule 3745-54-15(B) (3)]
- Y —
- iii. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [O.A.C. Rule 3745-54-15(B) (4)]
- Y —
2. Does the Permittee remedy deterioration or any malfunctions discovered by an inspection, as required by O.A.C. Rule 3745-54-15(C)? [Condition B.5.]
- Y —
3. Is the Permittee maintaining records of inspections as required by O.A.C. Rule 3745-54-15(D)? [Condition B.5]
- Y —

REMARKS

INSPECTIONS

(14)

SECURITY PROVISIONS

- | | Y/N | N/A | RMK# |
|---|----------|-----|------|
| 1. Is the Permittee complying with the security provisions of the approved application and the following requirements of O.A.C. Rule 3745-54-14 and Condition B.4. of the permit: | <u>Y</u> | | — |
| (a) Does the Permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility, or; | <u>Y</u> | | — |
| (b) An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility, or; | <u>Y</u> | | — |
| (c) A means to control entry, at all times, through gates or other entrances, to the active portion of the facility? | <u>Y</u> | | — |
| 2. In accordance with O.A.C. Rule 3745-54-14(C), does the Permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.] | <u>Y</u> | | — |

FACILITY OPERATION

- | | | | |
|--|----------|--|---|
| 3. Is construction, maintenance and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil ground or surface waters? [Condition B.1.] | <u>Y</u> | | — |
|--|----------|--|---|

REMARKS

PERSONNEL TRAINING

	Y/N	N/A	RMK#
1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of O.A.C. Rule 3745-54-16: [Condition B.6.]	<u>Y</u>		
(a) The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [O.A.C. Rule 3745-54-16(A) (B) (C)]	<u>Y</u>		
(b) The facility provides personnel training to new employees within 6 months after date of employment as required by O.A.C. Rule 3745-54-16(B)?	<u>Y</u>		
(c) The facility provides an annual refresher training course as required by O.A.C. Rule 3745-54-16(B)?	<u>Y</u>		
2. Is the Permittee maintaining personnel training records as required by O.A.C. Rule 3745-54-16(D) and of the approved application, including; written job titles, job descriptions and documented employee training records? [Condition B.6.]	<u>Y</u>		

REMARKS

REQUIRED EQUIPMENT

- | | Y/N | N/A | RMK# |
|--|----------|-----|------|
| 1. Is the Permittee, at a minimum, maintaining at the facility the equipment set forth in Sections G of the approved permit application? [Condition B.8.] | <u>Y</u> | | |
| 2. Is the Permittee inspecting, testing and maintaining the equipment specified in Question #1 to assure its proper operation as specified in O.A.C. Rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.9.] | <u>Y</u> | | |
| 3. Whenever hazardous waste is being managed at the facility, has the Permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device as required by O.A.C. Rule 3745-54-34 and Section G of the approved permit application? [Condition B.10] | <u>Y</u> | | |

REQUIRED AISLE SPACE

4. Is the Permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination in the event of an emergency to any area of the facility as required by O.A.C. Rule 3745-54-35? NA

REMARKS

No drums in permitted storage area

CONTINGENCY PLAN - EMERGENCY PROCEDURES

	Y/N	N/A	RMK#
1. In compliance with Condition B.10 of the permit, does the Permittee familiarize the emergency response agencies listed on page 155 in the approved contingency plan, any haz-mat teams responding to emergencies at the facility with:			
(a) The layout of the facility;	<u>Y</u>		
(b) Properties of hazardous waste managed at the facility and associated hazards;	<u>Y</u>		
(c) Places where facility personnel will normally be working;	<u>Y</u>		
(d) Entrances to and road inside the facility; and	<u>Y</u>		
(e) Possible evacuation routes?	<u>Y</u>		
 NOTE: The emergency agencies listed at page 155 in the approved contingency plan include:			
<div style="margin-left: 40px;">- City of Ashtabula Fire Department;</div> <div style="margin-left: 40px;">- Ashtabula Township Fire Department;</div> <div style="margin-left: 40px;">- State Highway Patrol - Ashtabula Post;</div> <div style="margin-left: 40px;">- Sheriff's Department - Jefferson;</div> <div style="margin-left: 40px;">- Ashtabula County Medical Center, and;</div> <div style="margin-left: 40px;">- Emergency Management Agency - Jefferson.</div>			
2. Did the Permittee inform all agencies listed on page 155 of the approved plan of safety equipment, supplies, and proper safety procedures that are applicable to the facility, and any further requirements imposed by the conditions of the permit? [Condition B.10.]	<u>Y</u>		
3. Did the Permittee familiarize Ashtabula County Medical Center with the properties of the hazardous waste managed at the facility and the types of injuries or illness which could result from fires, explosions, or releases of hazardous wastes? [Condition B.10.]	<u>Y</u>		
4. Has a state or local agency declined to enter into the arrangements set forth in O.A.C. Rule 3745-54-37(A)? If so,	<u>N</u>		
(a) Has the Permittee documented the refusal in the operating record as required by O.A.C. Rule 3745-54-37(B)? [Condition B.10.(b)]	<u>NA</u>		

5. Has the Permittee, in accordance with O.A.C. Rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan? [Condition B.10.(c)] Y
6. Has the Permittee notified the agencies in Question #1, in writing, within (10) days of the effective date of any amendments or revisions to the plan? [Condition B.10.(c)] Y
7. Is the Permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with O.A.C. Rule 3745-54-54? Y

EMERGENCY COORDINATOR

8. In accordance with O.A.C. Rule 3745-54-55 and Condition B.15., is an emergency coordinator on premises or on call at all times? Y
9. In accordance with O.A.C. Rule 3745-54-55 and Condition B.15. of the permit, is/are the emergency coordinator(s) at the facility familiar with the following:
- (a) Contingency plan? Y
 - (b) Facility operations/activities Y
 - (c) Waste characterization and locations Y
 - (d) Facility layout? Y
10. In accordance with O.A.C. Rule 3745-55-43 and Condition B.15. of the permit, does/do the emergency coordinator(s) have the authority to commit the resources needed to carry out the contingency plan? Y

IMPLEMENTATION OF CONTINGENCY PLAN

11. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility since date of last inspection? If so, N
- (a) Did the Permittee immediately implement the approved Contingency Plan and follow the emergency procedures described in O.A.C. Rule 3745-54-56? [Condition B.11] and; NA

(b) Did the Permittee collect and manage released material, emergency response material and by-products as hazardous waste until making a demonstration to Ohio EPA that such materials are subject to Ohio hazardous waste rules? [Condition B.13]

NA — —

(c) Within (15) days of the incident, did the Permittee submit to the Director, a written report of the incident? If so,

NA — —

i. Did the report contain the elements set forth in O.A.C. Rule 3745-54-56(J)? [Condition B.16.(a)]

NA — —

(d) Did the Permittee note in the operating record the time, date and details of any incident that required implementation of the approved contingency plan? [Condition B.16.(a)]

NA — —

REMARKS

CLOSURE REQUIREMENTS

	Y/N	N/A	RMK#
1. Is the Permittee maintaining at the facility, a closure plan which contains the elements set forth in O.A.C. Rule 3745-55-12? [Condition B.21. (a)]	<u>Y</u>		
2. Is the Permittee keeping at the facility, the latest closure cost estimate as required by O.A.C. Rule 3745-55-42 (D)? [Condition B.26. (c)]	<u>Y</u>		
3. Has the Permittee amended the closure plan?	<u>Y</u>		
(a) If so, has the plan been amended in accordance with O.A.C. Rule 3745-55-12 (C)? [Condition B.21. (b)]	<u>NA</u>		Has requested changes not acted on yet
4. Has the Permittee closed the facility? If so,	<u>N</u>		now closing
(a) Was closure conducted in accordance with the closure performance standard of O.A.C. Rule 3745-55-11? [Condition B.19.]	<u>NA</u>		
(b) Did the Permittee carry out the approved closure plan as set forth in the permit application and the condition of the permit? [Condition B.20.]	<u>NA</u>		
(c) After receiving the final volume of hazardous waste, did the Permittee remove from the facility all hazardous waste and complete closure activities in accordance with the schedule specified in the approved closure plan and as required by O.A.C. Rule 3745-55-13? [Condition B.23.]	<u>NA</u>		
(d) Has the Permittee decontaminated and/or disposed of all facility equipment as required by O.A.C. Rule 3745-55-14 and the approved closure plan? [Condition B.24]	<u>NA</u>		
(e) Has the Permittee certified that the facility has been closed in accordance with the specifications in the approved closure plan as required by O.A.C. Rule 3745-55-15? [Condition B.25.]	<u>NA</u>		

REMARKS

FINANCIAL ASSURANCE REQUIREMENTS

NOTE: An evaluation of compliance with the following permit conditions applicable to financial assurance and closure cost update is not encompassed in this inspection and is to be evaluated by Ohio EPA, Central Office financial assurance personnel at a later date.

	Y/N	N/A	RMK#
1. Is the Permittee demonstrating compliance with O.A.C. Rules 3745-55-43 and 3745-55-46, by providing documentation of financial assurance, as required by Condition B.27. of the permit?	<u>Y</u>		_____
2. Is the Permittee demonstrating compliance with the financial assurance requirements of O.A.C. 3745-55-47 and the documentation requirements of O.A.C. Rule 3745-55-51? [Condition B.27.]	<u>Y</u>		_____
3. Is the Permittee in compliance with O.A.C. Rule 3745-55-48? [Condition B.30]	<u>Y</u>		_____
4. Has the Permittee submitted the properly identified documents, listed below, to the Ohio EPA within (90) days after the journalization of the permit [Condition A.26.]:			
(a) An updated and remediated financial assurance mechanism for closure in accordance with O.A.C. Rule 3745-55-43, and worded as specified in O.A.C. Rule 3745-55-51?	<u>Y</u>		_____
(b) An updated and remediated financial assurance mechanism for liability insurance, in accordance with O.A.C. Rule 3745-55-47 and worded as specified in O.A.C. Rule 3745-55-51?	<u>Y</u>		_____
(c) An updated estimate for closure in accordance with O.A.C. Rule 3745-55-42?	<u>Y</u>		_____

REMARKS

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

	Y/N	N/A	RMK#
1. Does the Permittee separate ignitable and/or reactive wastes and protect each from sources of ignition or reaction in accordance with O.A.C. Rule 3745-54-17? [Condition B.7.(a)]	<u>Y</u>		
2. Does the Permittee confine smoking and open flames to designated areas when ignitable or reactive wastes are being handled as required by O.A.C. Rule 3745-54-17(A)? [Condition B.7.(a)]	<u>NA</u>		
3. Are "No Smoking" signs placed where there is a hazard from ignitable or reactive wastes as required by O.A.C. Rule 3745-54-17? [Condition B.7.(a)]	<u>NA</u>		
4. Does the Permittee prevent the commingling of sodium/calcium sludge or items containing sodium/calcium sludge with any other material or place them where they may be commingled with any other material? [Condition B.7.(b)]	<u>Y</u>		
5. Does the Permittee follow the procedures set forth in Response to HWFB Request #11 (attached as Appendix A) to prevent the reaction of sodium/calcium sludge or its commingling with incompatible materials? [Condition B.7.(b)]	<u>Y</u>		
6. Does the Permittee at all times maintain diking around tanks storing sulfuric acid located in areas where a spill may be washed into the waste pile? [Condition B.7.(c)]	<u>Y</u>		
7. Is the diking area noted in Question #6 of sufficient dimension to contain the volume of the largest tank within its boundary? [Condition B.7.(c)]	<u>Y</u>		

REMARKS

STORAGE IN WASTE PILES

	Y/N	N/A	RMK#
1. Is the Permittee storing only D005, D006 and D008 hazardous wastes in the waste pile? [Condition C.1. (a)]	<u>Y</u>		<u>only D005</u>
2. Does the Permittee limit the annual quantities of wastes stored in the pile to no more than 3,000,000 lbs/year as specified in Condition C.1. (a) of the permit?	<u>Y</u>		
3. Does the design capacity of the waste pile exceed no more than 40 cubic yards? [Condition C.1. (b)]	<u>Y</u>		
4. Is the waste stored in the pile limited exclusively to cell bath wastes generated on-site during the operation and maintenance of the Downs Cell Process? [Condition C.1. (c)]	<u>Y</u>		
5. Does the Permittee prohibit the management of wastes generated from off-site in the waste pile? [Condition C.1. (c)]	<u>Y</u>		
6. Is the construction, operation and maintenance of the waste pile as specified in Condition H and Section D of the approved application conducted in a manner which ensures that:			
(a) Liquids or materials containing free liquids are not placed in the pile? [Condition C.2. (a)]	<u>Y</u>		
(b) The pile is protected from surface water run-on? [Condition C.2. (b)]	<u>Y</u>		
(c) The pile is designed and operated to control dispersal of the waste by wind, where necessary, by means other than wetting? [Condition C.2. (c) and C.3. (h)]	<u>Y</u>		
(d) Decomposition or other reactions do not occur? [Condition C.2. (d)]	<u>Y</u>		
(e) The pile will not be closed with waste left in place? [Condition C.2. (e)]?	<u>Y</u>		
(f) The pile is placed on a base, which is approved by the Director for its intended use? [Condition C.2. (f)]	<u>Y</u>		
(g) The pile (including its underlying base) is located entirely above the seasonal high water table? [Condition C.2. (g)]	<u>Y</u>		

	Y/N	N/A	RMK#
7. Is the Permittee inspecting the waste pile in accordance with the requirements of O.A.C. Rules 3745-56-53 and 3745-56-54 and the following [Condition C.3.]:	Y		
(a) The pile is inspected daily when in use? [Condition C.3.(a)]	Y		
(b) Waste pile inspections include the area at the top of the chute? [Condition C.3.(b)]	Y		
(c) Cell bath spillage at the top of the chute is cleaned immediately? [Condition C.3.(c)]	Y		
(d) Cell bath waste at no time remains outside the waste pile? [Condition C.3.(d)]	Y		
(e) Spill clean equipment is maintained at locations designated in the approved contingency plan? [Condition C.3.(e)]	Y		
(f) The pile is inspected when in use or daily (whichever is more frequent) for accumulated liquids extending beyond the waste pile and any liquids found are immediately absorbed and added to the waste pile? [Condition C.3.(i)]	Y		
8. Within sixty (60) days after permit journalization, did the Permittee:			
(a) Complete closure of the back (chute) portion of the pile? [Condition C.3.(g) (i)]	Y		
(b) Install simple gutters or a "drip rail" at the base of the "drop chute" which extends from the second floor of the production building to the pile, or install any other means to prevent precipitation or blowing snow coming in contact with the waste and to prevent wind dispersal? [Condition C.3.(g) (ii)]	Y		
9. Does the Permittee annually remove all waste from the waste pile structure and "broom clean" so that the floor can be thoroughly inspected for corrosion and leaks? [Condition C.3.(j)]	Y		
10. Does the Permittee prohibit the management of ignitable wastes in the waste pile? [Condition C.4.]	Y		

Y/N N/A RMK#

11. Does the Permittee prohibit the storage of waste in the pile which, when commingled, may product heat or pressure, fire or explosion, violent reaction, or toxic or flammable dusts, fumes or gases? [Condition C.5.(a)]
12. Does the Permittee prohibit the management of oxidizing agents in the waste pile? [Condition C.5.(b)]?

Y

—

Y

—

REMARKS

STORAGE IN CONTAINERS

Y/N N/A RMK#

1. Is the Permittee storing, in containers, only the following wastes? [Condition E.1. (a)]

EPA HAZARDOUS
WASTE NO.

ANNUAL QUANTITY
OF WASTE

D003

3,600 lbs/year

NA

*Have reached
the burning
limit. No
waste stored*

2. Does the Permittee limit the annual quantities of wastes stored in containers as specified in Question #1 to 3,600 lbs/year? [Condition E.1. (a)]

NA

3. Does the Permittee maintain a maximum capacity for container storage of no greater than 660 gallons? [Condition E.1. (b)]

NA

CONTAINER MANAGEMENT

4. Are all containers holding hazardous waste in good condition? [Condition E.2.]

NA

(a) If not, did the Permittee transfer the hazardous waste to a container that was in good condition or manage the waste in some other manner that complies with the requirements of the Ohio hazardous waste rules? [Condition E.2.]

NA

5. Is the Permittee using containers made of or lined with, materials which will not react with the hazardous waste to be stored? [Condition E.3]

NA

6. Are containers holding hazardous waste always kept closed during storage, except when it is necessary to add or remove waste? [Condition E.4. (a)]

NA

7. Are containers holding hazardous waste being opened, handled, or stored in a manner which may rupture the container or cause it to leak? [Condition E.4. (b)]

NA

8. At least weekly, is the Permittee inspecting areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors? [Condition E.5.]

NA

CONTAINMENT SYSTEM REQUIREMENTS

Y/N N/A RMK#

9. Does the container storage area have a containment system is designed and operated in accordance with O.A.C. rule 3745-55-75(B), except as provided by paragraph (C) of that rule? [Condition E.6.]

NA

Solid waste

IGNITABLE/REACTIVE/INCOMPATIBLE WASTE

10. Are containers holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line? [Condition E.7.]

Y

area is 50 ft away

11. Are incompatible wastes placed in the same containers? If so,

N

Is the Permittee in compliance with O.A.C. rule 3745-54-17(B)? (See Ignitable/Reactive/Incompatible Waste Requirements section of checklist)? [Condition E.8. (a)]

Y

12. Are hazardous wastes placed in an unwashed container that previously held an incompatible waste or material? [Condition E.8. (b)]

N

dedicated drums physically different

13. Are storage containers holding incompatible hazardous wastes separated from the other materials or protected from them by means of a dike, berm, wall, or other device? [Condition E.8. (c)]

NA

CLOSURE

14. At closure, have all hazardous waste and hazardous waste residues been removed from the containment system and have remaining containers, liners, bases and soil containing or contaminated with hazardous waste or hazardous waste residues been decontaminated or removed? [Condition E.9.]

NA

closure only. . . regaining

REMARKS

THERMAL TREATMENT REQUIREMENTS

Y/N N/A RMK#

WASTE IDENTIFICATION

1. Is the Permittee thermally treating only the following wastes as specified in the permit and in compliance with the annual allowable quantities [Condition D.1.(a)]:

EPA WASTE	DESCRIPTION	ANNUAL QUANTITY OF WASTE		
D003	Sodium/calcium sludge from sodium cell parts	22,000 lbs/yr	<u>Y</u>	_____
D003	Waste sodium from RMI-MRP tank car spoolpiece	1,200 lbs/yr	<u>Y</u>	_____
D003	Waste sodium from RMI-MRP sinter pot spoolpiece	2,400 lbs/yr	<u>Y</u>	_____
	NOT TO EXCEED:	30,000 lbs/yr	<u>Y</u>	_____

NOTES: While the individual annual quantities of wastes are approximations, the TOTAL annual quantity of waste to be thermally treated SHALL NOT EXCEED 30,000 pounds.

2. Does the Permittee maintain a maximum design capacity of the thermal treatment unit of 1,700 lbs/day? [Condition D.1.(c)] Y _____
3. Is D003 waste only present in the combustion zone during thermal treatment? [Condition D.1.(c)] Y _____
4. Is waste thermally treated managed in a manner as set forth in the applicant's Response to the Board's Order Requiring Responses and Authorizing Comments, with accompany Attachment I (See Appendix B of permit)? [Condition D.1.(c)] Y _____
5. Does sodium/calcium sludge contain no greater than 150 ppm of barium prior to thermal treatment? [Condition D.1.(d)] Y _____
6. Does the Permittee conduct annual waste analysis to ensure that wastes treated contain no more than 150 ppm of barium? [Condition D.1.(d)] Y _____

Ba at detection

Y/N N/A RMK#

7. Within 60 days after permit journalization, or the installation of a high energy Venturi Scrubber (whichever is later), did the Permittee submit to the Ohio EPA:

(a) Results of emission tests? [Condition D.1.(e)]

Y

(b) A demonstration that the off-site ambient time-weighted average levels (as defined by the American Conference of Governmental Industrial Hygienists) of NaOH, CaOH, and CaO do not exceed 2.0, 5.0 and 2.0 mg/m3, respectively? [Condition D.1.(e)]

Y

(c) Does the demonstration identified in 6(b) above also confirm that the ambient level for NaOH does not exceed 2.0 mg/m3 at any given time? [Condition D.1.(e)]

Y

8. Does the Permittee monitor the stack plume at least hourly when the thermal treatment unit is in operation in accordance with O.A.C. Rule 3745-68-77(B)? [Condition D.3.]

Y

9. Does the Permittee inspect the complete thermal treatment unit daily when in operation for leaks, spills and fugitive emissions in accordance with O.A.C. Rule 3745-68-77(C)? [Condition D.4.]

Y

END OF PERMIT CONDITIONS

REMARKS

OAC CHAPTER 3745-59 - LDR GENERAL REQUIREMENTS

CASE-BY-CASE EXTENSIONS

Y/N/NA RMK#

1. Has the entity received an extension for compliance with land disposal restrictions from US EPA pursuant to 40 CFR 268.5? If yes,

N

(a) List the waste(s) affected:

- (b) Has the extension been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-05(C)]

NA

(c) When does the extension expire? _____

NOTE: A case-by-case extension can be granted for up to one year. The extension is renewable once (by US EPA) for an additional year. Until receiving approval of the extension by US EPA and recognition of the extension by the Director of Ohio EPA, the entity must continue to manage the waste in accordance with all applicable LDR requirements.

VARIANCE FROM A TREATMENT STANDARD

2. Has the entity been granted a variance from a treatment standard by US EPA pursuant to 40 CFR 268.44? If yes,

N

(a) List the waste(s) affected:

- (b) Has the variance been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-44(C)]

NA

NOTE: Until the variance has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

NO MIGRATION PETITION

Y/N/NA RMK#

3. Has the entity received a variance from US EPA to allow for continued land disposal of untreated LDR wastes based upon a demonstration that there will be no migration from the disposal unit pursuant to 40 CFR 268.6? If yes,

N _____

(a) List the waste(s) affected:

- (b) Has the entity's "no migration" demonstration been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-06(C)]

NA _____

NOTE: Until the no migration petition has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

PROHIBITION AGAINST DILUTION

4. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [O.A.C. Rule 3745-59-03; 40 CFR 268.3]

(a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards?

N _____

(b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)?

N _____

(c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-35 (40 CFR 268.30 through 268.35)?

N _____

(d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA?

N _____

NOTE: If the answer to any of the Questions 4(a) through 4(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of O.A.C. Rule 3745-59-03 (40 CFR 268.3).

NOTE: Dilution of wastes is permissible under some conditions. See O.A.C. Rule 3745-59-03(B) (40 CFR 268.3) and the Third Third final rule preamble for additional information.

LDR - GENERATOR REQUIREMENTS

NOTE: The following requirements apply only to large quantity generators and small quantity generators. Conditionally exempt small quantity generators are exempt from land disposal restriction requirements as referenced in O.A.C. Rules 3745-59-01(B) (1) (40 CFR 268.1(e) (1)) and 3745-51-05(B) (40 CFR 261.5(b)).

EVALUATION OF WASTES/DETERMINING APPROPRIATE TREATMENT STANDARDS

Y/N/NA RMK#

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]

Y _____

 - (a) For determinations based solely on knowledge of the waste: Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]

Y _____
 - (b) For determinations based upon analytical testing: Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]

Y _____
2. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]

Y *On all but one manifest* _____
3. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]

Y _____
4. Does the entity generate any listed waste(s) which are restricted from land disposal? If so,

Y _____

 - (a) Do such wastes also exhibit hazardous waste characteristics as identified in O.A.C. Rules 3745-51-20 to 3745-52-24? (40 CFR 261.20 through 261.24)?

N _____
 - (b) For listed wastes which also exhibit a characteristic: Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [O.A.C. Rule 3745-59-09(A); 40 CFR 268.9(a)]

NA _____

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g. a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See O.A.C. Rule 3745-59-09(B); 40 CFR 268.9(b)]

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

Y/N/NA RMK#

5. Does the generator treat characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous?

N _____

(a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?

NA _____

i. If so, with each shipment of waste, does the generator submit a notification and certification to the Regional Administrator/Director which contains the following:

a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09 (D) (1) (a); 40 CFR 268.9 (d) (1) (i)]

NA _____

b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. [Rule 3745-59-09 (D) (1) (b); 40 CFR 268.9 (d) (1) (ii)]

NA _____

c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09 (D) (1) (c); 40 CFR 268.9 (d) (1) (iii)]

NA _____

ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07 (B) (5) (a) (40 CFR 268.7 (b) (5) (i)? [O.A.C. Rule 3745-59-09 (D) (2); 40 CFR 268.9 (d) (2)]

NA _____

NOTE: An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10. [See O.A.C. Rule 3745-65-01]

REMARKS

Treatment is in a permitted unit

NOTIFICATION/CERTIFICATION

Y/N/NA RMK#

6. **For wastes that do not meet treatment standards:** Does the generator notify the treatment/storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]

Y _____

If so, does the notification include the following:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (1) (a); 40 CFR 268.7(a) (1) (i)]

Y _____

- (b) Appropriate treatment standard for the waste? [O.A.C. Rule 3745-59-07(A) (1) (b); 40 CFR 268.7(a) (1) (ii)]

Y *except on one manifest*

- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (1) (c); 40 CFR 268.7(a) (1) (iii)]

Y _____

- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (1) (d); 40 CFR 268.7(a) (1) (iv)]

Y _____

7. Is the notification identified in Question #6 submitted with each shipment of waste? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]

Y _____

8. **For wastes that meet treatment standards:** Does the generator submit a written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A) (2); 40 CFR 268.7(a) (2)]

NA _____

If so, does the notice/certification include the following:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (2) (a) (i); 40 CFR 268.7(a) (2) (i) (A)]

| _____

- (b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (ii); 40 CFR 268.7(a) (2) (i) (B)]

| _____

- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (iii); 40 CFR 268.7(a) (2) (i) (C)]

| _____

- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (2) (a) (iv); 40 CFR 268.7(a) (2) (i) (D)]

| _____

- (e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07(A) (2) (b); 40 CFR 268.7(a) (2) (ii)]

✓ _____

9. Is the notification/certification identified in Question #8 submitted with each shipment of waste? [O.A.C. 3745-59-07 (A) (2); 40 CFR 268.7(a) (2)]

NA

10. **For wastes subject to a case-by-case extension, exemption or a variance:** Does the generator provide written notice to the facility receiving the waste that the waste is not prohibited from land disposal? [O.A.C. Rule 3745-59-07 (A) (3); 40 CFR 268.7(a) (3)]

NA

If so, does the notice contain the following information:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07 (A) (3) (a); 40 CFR 268.7(a) (3) (i)]
- (b) The corresponding treatment standard and applicable prohibitions? [O.A.C. Rule 3745-59-07(A) (3) (b); 40 CFR 268.7(a) (3) (ii)]
- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (3) (c); 40 CFR 268.7(a) (3) (iii)]
- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (3) (d); 40 CFR 268.6(a) (3) (iv)]
- (e) The date the waste is subject to the prohibitions? [O.A.C. Rule 3745-59-07(A) (3) (e); 40 CFR 268.7(a) (3) (v)]

11. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [O.A.C. Rule 3745-59-07(A) (6); 40 CFR 268.7(a) (7)]

REMARKS

LDR - TREATMENT FACILITY REQUIREMENTS

REQUIRED TREATMENT

Y/N/NA

RMK#

1. Does the facility treat any restricted wastes for which a specified technology (or technologies) has/have been established as the LDR treatment standard?

N

- (a) If so, is the facility using the appropriate technology as required by O.A.C. Rule 3745-59-42 (40 CFR 268.42)?

NA

- (b) If not, has US EPA granted the facility approval to use an alternative treatment method other than the required technology? [O.A.C. Rule 3745-59-42 (B); 40 CFR 268.42 (b)]

NA

2. Does the facility treat restricted wastes for which a concentration level has been established as the LDR treatment standard?

NA

If so, does the treatment facility test its waste treatment residues according to the following requirements:

- (a) For wastes with treatment standards expressed as a concentration in the waste extract (a CCWE standard found in O.A.C. Rule 3745-59-41; 40 CFR 268.41):

Following treatment, does the treatment facility test the treatment residues or an extract of such residues using the TCLP test to assure that the residues or extract meet the applicable treatment standard? [O.A.C. Rule 3745-59-07(B) (1); 40 CFR 268.7(b) (1)]

NA

- (b) For wastes with treatment standards expressed as concentrations in the waste (a CCW standard found in Rule 3745-59-43; 40 CFR 268.43):

Does the treatment facility test treatment residues (not an extract of such residues) using a total constituent analysis to assure that the residues meet applicable treatment standards? [O.A.C. Rule 3745-59-07(B) (3); 40 CFR 268.7(b) (3)]

NA

3. Does the treatment facility combine waste streams together for the purposes of treatment which have a concentration based LDR treatment standard for the same constituent(s)?

N

- (a) If so, does the treatment facility ensure that the more stringent standard for the mixture is met? [O.A.C. Rule 3745-59-41(B) and 3745-59-43(B); 40 CFR 268.41(b) and 268.43(b)]

NA

OFF-SITE SHIPMENTS - NOTIFICATION/CERTIFICATION REQS.

Y/N/NA RMK#

4. For all restricted wastes: Does the treatment facility have hazardous waste and/or treatment residues shipped off-site for land disposal?

N _____

If so, does the treatment facility provide the land disposal facility with a written notice containing the following:

- (a) EPA hazardous waste number? [3745-59-07(B) (4) (a); 40 CFR 268.7(b) (4) (i)]
- (b) The corresponding treatment standards and applicable prohibitions for each waste? [3745-59-07(B) (4) (b); 40 CFR 268.7(b) (4) (ii)]
- (c) The manifest number associated with the shipment of waste? [3745-59-07(B) (4) (c); 40 CFR 268.7(b) (4) (iii)]
- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(B) (4) (d); 40 CFR 268.7(b) (4) (iv)]

NA _____

NA _____

NA _____

NA _____

5. Does the facility have any wastes and/or treatment residues shipped off-site for disposal which have been generated from treatment of a restricted waste to meet treatment standards? If so,

N _____

For wastes and/or treatment residues generated from the treatment of a waste which has a **concentration based** treatment standard:

- (a) Does the treatment facility also submit a written certification with each shipment of waste or treatment residue stating that the waste has been treated in compliance with applicable treatment standards? [O.A.C. Rule 3745-59-07(B) (5); 40 CFR 268.7(b) (5)]
- (b) Does the certification contain the language as required by O.A.C. Rule 3745-59-07(B) (5) (a) (40 CFR 268.7(b) (5) (i))?

NA _____

NA _____

For wastes and/or treatment residues generated from the treatment of a waste which has a **technology based** treatment standard:

- (c) With each shipment of treatment residue shipped off-site for disposal, does the treatment facility submit a certification stating that the waste has been treated in accordance with the appropriate treatment technology as specified in O.A.C. Rule 3745-59-42 (40 CFR 268.42)? [O.A.C. Rule 3745-59-07(B) (5); 40 CFR 268.7(b) (5)]

NA _____

- (d) Is the certification signed by an authorized representative and does it contain the language as specified in O.A.C. Rule 3745-59-07(B) (5) (b) (40 CFR 268.7(b) (5) (ii)?

NA

6. Does the treatment facility have wastes shipped off-site that do not meet treatment standards and/or wastes that must be further managed at a different treatment or storage facility? If so,

N

- (a) Is the facility complying with the generator notification requirements? [O.A.C. Rule 3745-59-07(B) (6); 40 CFR 268.7(b) (6)]

NA

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

7. Does the facility treat characteristic hazardous waste(s) to render such waste(s) non-hazardous?

Y

- (a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?

N

once treated
goes to
WWTP
on site

- i. If so, with each shipment of waste, does the generator submit a notification/certification to the Regional Administrator/Director which contains the following:
- a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09(D) (1) (a); 40 CFR 268.9(d) (1) (i)]
- b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. Rule 3745-59-09(D) (1) (b); 40 CFR 268.9(d) (1) (ii)]
- c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09(D) (1) (c); 40 CFR 268.9(d) (1) (iii)]
- ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07(B) (5) (a) (40 CFR 268.7(b) (5) (i)? [O.A.C. Rule 3745-59-09(D) (2); 40 CFR 268.9(d) (2)]

NANANANA

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

LDR - LAND DISPOSAL FACILITY REQUIREMENTS

Y/N/NA RMK#

1. Does the land disposal facility retain copies of LDR notices and certifications? . [O.A.C. Rule 3745-59-07(C) (1); 40 CFR 268.7(c) (1)] NA
2. Does the land disposal facility test the waste or an extract of the waste or treatment residue received in accordance with the the facility's waste analysis plan to ensure compliance with applicable LDR treatment standards, including: [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
 - (a) Conducting the TCLP to test waste/residues which have a CCWE concentration based treatment standard? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)] NA
 - (b) Conducting a total constituent analysis to test waste/residues which have a CCW concentration based treatment standard? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)] NA
 - (c) Is testing specified in 2(a) and 2(b) conducted in accordance with the frequency set forth in the facility's waste analysis plan? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)] NA

NOTE: Analytical testing of residues which have been generated from treatment of a waste which has a technology based treatment standard only is not required.

3. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which meet applicable concentration based treatment standards of O.A.C. rules 3745-59-41 or 3745-59-43 (268.41 or 268.43) are disposed of? [O.A.C. Rule 3745-59-40(A), (C); 40 CFR 268.40(a), (c)] NA
4. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which have been treated using the specified technology of O.A.C. Rule 3745-59-42 (40 CFR 268.42) are disposed of? [O.A.C. Rule 3745-59-40(B); 40 CFR 268.40(b)] NA

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

Facility: RMI Company, Sodium Plant
Address P.O. Box 550
Ashtabula, OH 44044

Ohio Permit: 02-04-0584
USEPA ID: OHD000810242

County: Ashtabula

Facility Phone: 216-997-5141

Inspection Date: 6/30/93

Time: 8:30 - 2:30

Inspectors:

<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
<u>Adrienne La Favre</u>	<u>OEPA/Env. Spec.</u>	<u>216-963-1250</u>

Facility Representatives:

<u>David Micsky</u>	<u>RMI/Env. Eng</u>	<u>216-544-7802</u>
<u>Douglas Korb</u>	<u>RMI/Plant Manager</u>	<u>216-997-2402</u>
<u>Rick Mason</u>	<u>RMI/Dir. Env. Affairs</u>	<u>216-544-7688</u>

Land Disposal Restricted wastes managed? (yes) ☒ (no) ☐
If so, completed LDR checklist.

Is the facility operating as a generator? (yes) ☐ (no) ☒
If so, complete the applicable sections of the Generator Requirements checklist for wastes being managed under generator status.

*Plant in closure -
all wastes now
part of closing
facility.*

PERMIT STATUS

Permit Issued: June 9, 1988
Permit Effective Date: July 21, 1988 (Date of Journalization)
Permit Expiration Date: July 21, 1993 (Five years after date of Journalization)

AUTHORIZED ACTIVITIES

STORAGE

☒ Container
☐ Tank
☒ Waste Pile
☐ Surface Impoundment

TREATMENT

☐ Tank
☐ Surface Impoundment
☐ Incinerator
☒ Thermal Treatment
(Renewal)

DISPOSAL

☐ Injection Well
☐ Landfill
☐ Land Application
☐ Surface
Impoundment

REMARKS - GENERAL INFORMATION

Include a list of the wastes being generated/managed at the site and a brief description of site activity and waste handling procedures:

The RMI Titanium Sodium Plant is no longer operational. The Facility is being dismantled and cleaned. There are/were two types of wastes managed at the site.

- 1) Barium contaminated salt and bath debris
- 2) Sodium - Na waste from closure activity from both RMI-Na and RMI Metals is being burned at RMI-Na.

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

Y/N N/A RMK#

July 23, 1993

1. Has the expiration date of the permit passed? If so,
 - (a) Is the Permittee continuing any activity regulated by the permit after the expiration date of the permit?
 - (b) Has the facility submitted an application for a permit renewal to the Director no later than (180) days prior to the expiration date of the permit (or upon a later date if the Permittee can demonstrate good cause for late submittal) [Condition A.6. (a)]?
2. Has the Permittee submitted the annual permit fee, payable to Treasurer of the State, to the Ohio EPA on or before the anniversary of the date of issuance during the term of the permit [Condition A.25.]?
3. Is the Permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit [Condition A.1. (b) and A.5]?
4. Have any provisions of the permit been identified as invalid? [Condition A.4]
5. Has the facility identified any instances of noncompliance with the permit, R.C. Chapter 3734 or the rules adopted thereunder, which may endanger human health or the environment? If so,
 - (a) Did the facility immediately report the following to Ohio EPA Emergency Response Section: [Condition A.19]
 - i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and
 - ii. Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health and the environment, including a description of:
 - a. Name, address and telephone number of the owner or operator?
 - b. Name, address and telephone number of the facility?
 - c. Date, time, type and source of release?

N expiration date

NA

Y

Y

N

N

N

NA

NA

NA

NA

Y/N N/A RMK#

- | | | | |
|--|-----------|-------|-------|
| d. Local weather conditions? | <u>NA</u> | _____ | _____ |
| e. Name and quantity of material(s) involved? | <u>NA</u> | _____ | _____ |
| f. The extent of injuries, if any? | <u>NA</u> | _____ | _____ |
| g. An assessment of the actual or potential hazard to the environment and human health, inside and outside the facility, where applicable? | <u>NA</u> | _____ | _____ |
| h. The response the facility took to contain and monitor the release? | <u>NA</u> | _____ | _____ |
| i. Who was notified? | <u>NA</u> | _____ | _____ |
| j. Any monitoring results? | <u>NA</u> | _____ | _____ |
| k. Estimated quantity and disposition of recovered material that resulted from the incident? | <u>NA</u> | _____ | _____ |
| 6. Did the Permittee provide a written report to the Ohio EPA Emergency Response Section within (5) days of the time the Permittee became aware of the circumstances reported in Question 5? [Condition A.20] If so, did the report contain: | <u>NA</u> | _____ | _____ |
| (a) A description of the noncompliance (including exact dates and times)? | <u>NA</u> | _____ | _____ |
| (b) Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? and; | <u>NA</u> | _____ | _____ |
| (c) Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance? | <u>NA</u> | _____ | _____ |
| 7. Has the Permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8.] | <u>NA</u> | _____ | _____ |

Y/N N/A RMK#

8. Has the Permittee identified any other instances of noncompliance not provided for in Question #5?

NA _____

(a) If so, did the Permittee report these instances to the Ohio EPA, DHWM within (15) days of becoming aware the noncompliance? [Condition A.21.]

NA _____

(b) Do the reports provided contain the information set forth in Condition A.19? [Condition A.21.]

NA _____

(c) Has the Permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8.]

NA _____

9. Has the Permittee planned any changes in the permitted facility or activity which may result in noncompliance with the conditions of the permit?

NA _____

(a) If so, has the facility provided Ohio EPA with advance notice of such changes? [Condition A.16.]

NA _____

NOTE: Such notification does not waive the Permittee's duty to comply with the permit pursuant to Condition A.5.

REMARKS

PERMIT MODIFICATION, REVISION, REVOCATION

Y/N N/A RMK#

1. Has the Permittee filed a request for a permit modification, revision or revocation since issuance of the permit?
[Condition A.2.]
2. Has the permit been transferred to a new owner or operator?
[Condition A.17.]
 - (a) If so, has the transfer been conducted in accordance with R.C. Chapter 3734 and the rules adopted thereunder?
[Condition A.17. (a)] and;
 - (b) Before transferring ownership did the Permittee notify the new owner in writing of the requirements of R.C. Chapter 3734 and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.17. (a) B.2. (a)]
3. Has the Permittee submitted reports of compliance or non-compliance with, or any progress reports on the requirements contained in any compliance schedule of the permit to the Ohio EPA no later than (14) days following each scheduled date, unless otherwise specified? [Condition A.18.]
4. Has the Permittee furnished relevant information which the Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10.]
5. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10]
6. Has the Permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings or that it submitted incorrect or incomplete information in permit issuance proceedings or other submissions to Ohio EPA or Ohio HWFB? If so,
 - (a) Has the Permittee promptly submitted such facts or corrected information to the appropriate entity?
[Condition A.22.]
7. Is the Permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications of the application?
[Condition A.13. (c)]

Y — —
N *No longer a partnership - now public*
NA — —
NA — —
Y *Inspection correspondence*
— — —
Y — —
Y — —
N — —
NA — —
Y — —

Y/N N/A RMK#

8. Is the Permittee retaining a complete copy of the approved application on-site? [Condition A.13.(c)]
9. Is the Permittee planning any physical alterations or additions to the permitted facility?
- (a) If so, has the Permittee given notice to the Director of such alterations/additions? [Condition A.14]
- (b) Have such changes been made in accordance with O.A.C. Rule 3745-50-51? [Condition A.14.]

Y _____

N _____

NA _____

NA _____

REMARKS